



1 This Motion is being made pursuant to Local Bankruptcy Rule (“LBR”) 4001-1, 11  
2 U.S.C. § 362(d), and Federal Rules of Bankruptcy Procedure (“FRBP”) Rule 4001, and is based  
3 on this Notice of Motion and the grounds for relief from stay under 11 U.S.C. § 362 as set forth  
4 in the accompanying Motion, the Memorandum of Points and Authorities in Support of the  
5 Motion, and the Declaration(s) in Support of the Motion being filed concurrently herewith, the  
6 complete files and records in this action, the oral argument of counsel, if any, and such other and  
7 further evidence as the Court might deem proper.

8 **PLEASE TAKE FURTHER NOTICE THAT** pursuant to LBR 4001- 1(c), Movant has  
9 filed and served its Motion with at least fourteen (14) days prior to the hearing date. Any party  
10 seeking to oppose the Motion must appear personally or by counsel at the above noticed  
11 preliminary hearing and indicate the basis of the opposition. Respondents opposing the Motion  
12 are not required, but may file responsive pleadings, points and authorities or declarations for any  
13 preliminary hearing. Failure to appear at the preliminary hearing, either personally or by counsel,  
14 may deemed by the Court to be consent to the granting of the relief requested in the Motion.

15 **PLEASE TAKE FURTHER NOTICE THAT** the hearing will not be conducted in the  
16 presiding judge’s courtroom but instead will be conducted by telephone or video. The  
17 Bankruptcy Court’s website provides information regarding how to arrange an appearance at a  
18 video or telephonic hearing. If you have questions about how to participate in a video or  
19 telephonic hearing, you may contact the court by calling 888-821-7606 or by using the Live Chat  
20 feature on the Bankruptcy Court’s website.

21 Respectfully Submitted,

22 **WRIGHT, FINLAY & ZAK, LLP**

23 Dated: April 10, 2024

By: /s/ Arnold L. Graff

Arnold L. Graff, Esq.

Attorneys for Movant.